

# **EXHIBIT 18**

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
-----X  
MARK I. SOKOLOW, et al.,  
  
PLAINTIFFS,  
  
-against- Case No:  
04CV397 (GBD) (RLE)  
  
THE PALESTINE LIBERATION ORGANIZATION, et  
al.,  
  
DEFENDANTS.  
-----X

DATE: August 3, 2012  
TIME: 10:42 A.M.

DEPOSITION of OZ GUETTA, taken  
by the Defendants, pursuant to Notice and  
to the Federal Rules of Civil Procedure,  
held at the offices of Morrison & Foerster,  
1290 Avenue of the Americas, New York, New  
York 10104, before Robert X. Shaw, CSR, a  
Notary Public of the State of New York.

1 Oz J. Guetta

2 approximately when your mother held a green  
3 card in the United States?

4 A. When? I know it's from back  
5 then. She used to live here for a long,  
6 long time.

7 Q. Before you were born?

8 A. Yes.

9 Q. All right. And prior to living  
10 in Tel Aviv, where did you live?

11 A. Jerusalem. The specific,  
12 Givat Zeev.

13 Q. And what was your mailing  
14 address in Givat Zeev?

15 A. Hate'Ena Street, Apartment 7.  
16 The ZIP was 90917.

17 Q. And you said Givat Zeev is in  
18 Jerusalem; is that correct?

19 A. The suburbs.

20 Q. It's a suburb of Jerusalem?

21 A. Yes.

22 Q. Is it located in the area that  
23 was occupied by Israel in 1967?

24 A. I do not know that.

25 Q. Do you know if Givat Zeev is

1 Oz J. Guetta

2 Q. Your aspect is very positive.  
3 You're smiling now; right?

4 A. Smiling and emotional, yes.

5 Q. Okay. You feel good about  
6 being a designer and studying design?

7 A. Yes.

8 Q. You mentioned earlier that when  
9 you were traveling back and forth between  
10 the U.S. and Israel you felt like you had  
11 not found yourself?

12 A. Yes.

13 Q. Do you now feel like you've  
14 found yourself?

15 A. Yes. Yes.

16 MR. HILL: Why don't we take a  
17 quick break.

18 THE WITNESS: Okay.

19 (Whereupon, a short recess was  
20 taken.)

21 Q. Mr. Guetta, I need to ask you  
22 some questions about the day you were  
23 attacked. That was January 22nd, 2001; is  
24 that correct?

25 A. January what?

1 Oz J. Guetta  
2 Q. January 22, 2001?  
3 A. No. January 8th.  
4 Q. I beg your pardon.  
5 And how old were you on January  
6 8th, 2001?  
7 A. 12.  
8 Q. And tell me what you recall  
9 about the day that you were shot.  
10 A. The day, or about the event?  
11 Q. About the event.  
12 A. We came back from my soccer  
13 practice. It was located in, right in the  
14 center of Jerusalem, where I played for  
15 Beiter, Jerusalem; that's a big team in  
16 Israel. I played in the junior team. You  
17 know -- you got, like here, same as here,  
18 you've got the big teams, and all the  
19 teams, they have junior teams.  
20 Q. Um-hum.  
21 A. So, there were, about that time  
22 I was playing for almost five years in that  
23 team, since I was six or seven. We got  
24 back, the same as every other day, we did  
25 that four times a week. One time my mom

1 Oz J. Guetta

2 Q. We're here today because you  
3 and your mother have brought a lawsuit;  
4 right? Do you know who you've sued in this  
5 case?

6 A. Um, the PA, um, and the Arab  
7 Bank.

8 Q. Are you, Mr. Guetta, aware of  
9 any evidence that the PA had anything to do  
10 with the shooting in which you were  
11 injured?

12 A. What is the question again?

13 Q. Are you aware of any evidence  
14 that the Palestinian Authority had anything  
15 to do with the shooting in which you were  
16 injured?

17 A. I'm aware through information  
18 that I got from the IDF that me, myself, I  
19 have no evidence that those are the guys.  
20 Um, we got information, though, it was the  
21 guys. Me, myself, I don't got no evidence.

22 Q. Okay. What information from  
23 the IDF are you referring to?

24 A. What do you mean?

25 Q. You said you got information

1 Oz J. Guetta

2 from the IDF. What information are you  
3 referring to?

4 A. They -- as far as we know, they  
5 took responsibility for that act. I have  
6 no evidence from me to do that, but they  
7 took the responsibility for that act.

8 Q. Who took the responsibility for  
9 that?

10 A. The PA.

11 Q. Okay. You're saying someone  
12 from the IDF told you the Palestinian  
13 Authority had taken responsibility for the  
14 attack on you?

15 A. Yes.

16 Q. Okay. Who from the IDF told  
17 you this?

18 A. I don't know. I don't recall.

19 Q. Do you recall when you were  
20 told this?

21 A. No. I don't recall.

22 Q. Do you remember where you were  
23 when you were told this?

24 A. I don't recall.

25 Q. Apart from the statement of

1 Oz J. Guetta

2 this IDF person, are you aware of any other  
3 evidence that the PA had anything to do  
4 with the attack in which you were injured?

5 A. In the media.

6 Q. Okay. What are you recalling  
7 from the media?

8 A. The press, the written press,  
9 and the television and the news. Every  
10 time after a terror attack, you know, the,  
11 they publish who took the responsibility  
12 for the acts, and for that act, as far as  
13 my knowledge, it was the PA.

14 (Phone Ringing.)

15 MR. SOLOMON: Just a second.

16 (Whereupon, an off-the-record  
17 discussion was held.)

18 Q. Before we went off the record,  
19 you mentioned that you recall, or believe  
20 you recall, seeing in the media that the  
21 Palestinian Authority had taken  
22 responsibility for the attack in which you  
23 were injured?

24 A. Correct.

25 Q. Apart from what someone in the



1 Oz J. Guetta

2 IDF told you and what you recall seeing in  
3 the media, are you aware of any other  
4 evidence that the Palestinian Authority had  
5 anything to do with this attack?

6 A. Me, myself, I don't have  
7 evidence. That's why we are here.

8 We have the law firm to help us  
9 to find that evidence.

10 Q. Right. I understand that.

11 And I'm just trying to  
12 establish, for the purposes of the case,  
13 that you, yourself, aren't aware of any  
14 evidence, other than the statement from the  
15 IDF and the newspaper articles?

16 A. Correct.

17 Q. Do you believe you have these  
18 newspaper articles?

19 A. I've got them right here with  
20 me. Oh, that says that the PA, I didn't  
21 know -- I don't -- not right now.

22 Q. So, just so the record is  
23 clear, you do have, you have brought some  
24 newspaper articles with you today; correct?

25 A. Correct.

1 Oz J. Guetta

2 Q. Okay. You're not saying that  
3 these are the ones that indicate the PA had  
4 something to do with it?

5 A. No. I can't say for sure,  
6 because there's a lot of stuff in here.

7 Q. When you say the PA, what are  
8 you referring to?

9 A. To the Palestinian Authority.

10 Q. Okay. And what do you  
11 understand that to be?

12 A. Um, I have not a lot of  
13 knowledge about that.

14 Q. Okay. Can you tell me what you  
15 do know about what the Palestinian  
16 Authority is?

17 A. That's -- that's the  
18 Palestinian Authority, I guess, it's like  
19 the Israeli government. They've got the  
20 Palestinian Authority.

21 Q. Okay. Are you aware of any  
22 evidence that the Palestine Liberation  
23 Organization had anything to do with the  
24 attack in which you and your mother were  
25 injured?

1 Oz J. Guetta

2 A. Me, myself, I don't know.

3 Q. You're not aware of any such  
4 evidence?

5 A. I'm not aware.

6 Q. Okay. You also mentioned that  
7 you had sued the Arab Bank. Are you aware  
8 of any evidence that the Arab Bank had  
9 anything to do with the attack in which you  
10 were injured?

11 A. As far as I know, I heard about  
12 the Arab Bank was assisting the families  
13 that were involved in terror attacks.  
14 That's my knowledge. And I wanted to find  
15 out if it's true.

16 Q. Okay. Do you -- who did you  
17 hear that from?

18 A. I don't recall.

19 Q. Okay. Do you know if the Arab  
20 Bank has provided assistance to anyone, the  
21 family of anyone that was involved in the  
22 attack in which you were injured?

23 A. Could you repeat that again.

24 Q. Do you know if the Arab Bank  
25 has provided assistance to the family of

1 Oz J. Guetta

2 anyone who was involved in attacking you?

3 A. I have no evidence, me, myself,  
4 no.

5 Q. Do you have any knowledge of  
6 the identity of the persons who attacked  
7 you?

8 A. No.

9 Q. Are you aware of any evidence  
10 as to what the identities of your attackers  
11 are?

12 A. No.

13 Q. Has anyone been charged with  
14 the crime in connection with the attack in  
15 which you were injured?

16 A. I don't understand.

17 Q. Do you know if anyone has ever  
18 been charged with the crime for the attack  
19 on you?

20 A. Not as far as I know.

21 Q. Is your case an unsolved case,  
22 as far as you know?

23 A. What are you talking about?  
24 The case where?

25 Q. I assume that the Israeli